



Focus

Reasonably Available Control Technology (RACT)

1996 RACT List and Schedule

Background

All existing industrial sources in Washington are required to use Reasonably Available Control Technology, or RACT, to control air emissions. In 1993, the Washington State Legislature required the Department of Ecology (Ecology) to establish a framework for systematically performing RACT determinations in the future (RACT List and Schedule). Ecology issued a draft List of RACT sources and a Schedule for conducting RACT evaluations for them in June 1994. Ecology revised the List and Schedule in late 1994 after consulting with local air pollution control authorities, the regulated community, environmental groups and other interested individuals and organizations.

Any source or source category's basic obligation is to be at RACT. This List and Schedule is only meant to prioritize which sources and source categories are expected to be evaluated in the near future. In setting these priorities, Ecology will take into account, among other factors, air quality problems associated with emissions from the particular source or source category.

The 1996 RACT List and Schedule will help agencies focus their resources on priority sources and source categories, help with interagency coordination and clarify which sources will be undergoing review. The RACT List and Schedule should help the regulated community, concerned citizens and other groups prepare for and participate in upcoming RACT evaluations.

The List and Schedule is meant to be an informational document, and is not a limit to any regulatory authority. RACT is a regulatory tool that can be used at any time by Ecology or local air pollution control authorities to address air quality problems. Ecology or local air pollution control authorities may need to perform RACT analyses on sources not on this List and Schedule in order to address such problems.

Review of RACT List and Schedule

The Legislature instructed Ecology to review the RACT List and Schedule within six months of receiving initial air operating permit applications, and at least once every five years after that. Since Ecology received the first of the air operating permit applications in June 1995, this Focus sheet serves as the first review of the RACT List and Schedule. It is Ecology's intent that the RACT List and Schedule will be updated each year.

Key Issues

Key issues in selecting sources and source categories include the following:

- RACT determinations for specific sources or geographic areas will address air quality problems associated with the specific source or sources in that area. A RACT determination for such sources generally will not occur simply because a new technology is available, unless an air quality problem exists at the current control levels.
- RACT rule-making will not generally begin in advance of federal standards unless there is an air quality problem to justify such action. In making this determination, Ecology will consider:
 - the degree of the air quality problem;
 - the scope of the federal rule-making (whether or to what extent the federal rule-making will address the same emission units and pollutants for which we have an air quality problem);
 - the effects of delaying the action until after the standard for Maximum Available Control Technology (MACT) is completed; and
 - Ecology's degree of involvement in the federal rule-making .

1996 RACT List and Schedule Categories

Group A

Group A sources/source categories are those for which RACT review is planned in the next five years. Group A is further divided into the following groups:

- **A1:** Sources/source categories that will receive or begin a detailed RACT review within the next two years. There are three sources and/or source categories in this group:

<u>Source/Source Category</u>	<u>Date RACT Review Began/Will Begin</u>
Hog fuel boilers	12/96
Fiberglass fabrication	07/97
Municipal waste combustors	06/96

- **A2:** Sources/source categories for which federal MACT regulations have been issued and which will be reviewed to determine whether the circumstances in Washington State call for other requirements and whether an indepth RACT review is appropriate.
- **A3:** Sources/source categories for which final MACT regulations are expected to be issued in the next two years. These will then be treated in a similar manner to those in A2.

It should be noted that MACT and RACT are different regulatory requirements and the process and evaluation results of one should not be confused with the other. Ecology brings them together in this document only for timing and regulatory efficiency purposes.

Group B

Group B sources/source categories are those for which EPA is currently developing MACT regulations under the federal Clean Air Act, and which have at least one source in Washington State. RACT review will begin for Group B sources/source categories within the next two years.

Group C

Group C sources/source categories consist of all sources and source categories not listed under Group A or Group B. These sources/source categories require further data collection to evaluate their placement under Group A or have already been evaluated for RACT. Ecology has not yet attempted to identify specific categories that would fall into a Group C. Ecology will continue to review information collected through the air operating permit program, the Environmental Protection Agency's rule-making efforts and other sources in order to make these determinations. Additional source categories will be added to Group A or Group B as part of the periodic review of the RACT List and Schedule, in order to fulfill the requirement that "RACT . . . is required for existing sources."

Public Involvement

Prior to finalizing the RACT List and Schedule, Ecology will consult with local air pollution control authorities, the regulated community, environmental groups and other interested individuals and organizations.

For More Information

For more information or for copies of the RACT List and Schedule, contact:

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